1 pled guilty to New Jersey state charges of conspiracy and wrongful 2 impersonation, in connection with what was publicly reported to be a 3 multimillion-dollar credit card fraud scheme that had nearly 1,000 victims. 4 Less than a year later, on March 31, 2014, he pled guilty to a separate and 5 unrelated federal wire fraud charge discussed in the government's motion. 6 7 DATED: May 27, 2021. 8 Respectfully submitted: TESSA M. GORMAN 9 Acting United States Attorney 10 s/ Cindy Chang 11 **CINDY CHANG** 12 SETH WILKINSON **Assistant United States Attorneys** 13 700 Stewart Street, Suite 5220 14 Seattle, WA 98101-1271 15 16 17 18 19 20 21 22 23 24 25 26 27 28